

FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

OCT 20 2011

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MICHAEL W. DOBBINS

CLERK, U.S. DISTRICT COURT

USA

Plaintiff
v.

Aimee Krause

Defendant

Case Number: 11cv5937

Judge: Jeffery Gilbert

11cv5937

MOTION TO DIMISS AND FOR SANCTIONS

NOW COMES, defendant, AIMEE KRAUSE, pro se litigant, and moves this honorable court to dismiss this action and sanction Mr. John A. Goudge for his failure to redact personal identifiers filed using the PACER system. In support of this motion defendant states as follows:

1. On August 26, 2011, plaintiff's counsel filed a complaint with exhibits(s) A-F in violation of FRCP 5.2(a).
2. As of 10/20/2011, the un-redacted document with all exhibits remains available online. (ExhibitA). It shows that this information is available in perpetuity on the internet and Motions to Strike are not a remedy.
3. Defendant has discovered that Plaintiff's counsel has failed to properly redact in as many as 37 additional cases using the PACER system.

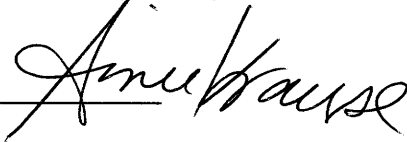
WHEREFORE, defendant, AIMEE KRAUSE, prays for the following:

1. The Court issue sanctions against Mr. Goudge for failure to redact under FRCP 5.2(a).
2. The Court order that Mr. Goudge pay for credit monitoring for the defendant for a period of not less than 25 years.
3. The Court dismiss with prejudice the claim against the defendant. Plaintiffs attorney's actions and failure to redact have exposed defendant to unknown risks and future loss. This risk far outweighs

the money damages sought by the plaintiff. This sanction is what is necessary to deter repetition of this conduct.

4. The Court enjoin Plaintiff's attorney from filing using the PACER system until he has undergone retraining
5. The Court permanently seal the complaint's exhibits A, C & E and render them completely unavailable online.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Aimee Krause", written over a horizontal line.

Aimee Krause
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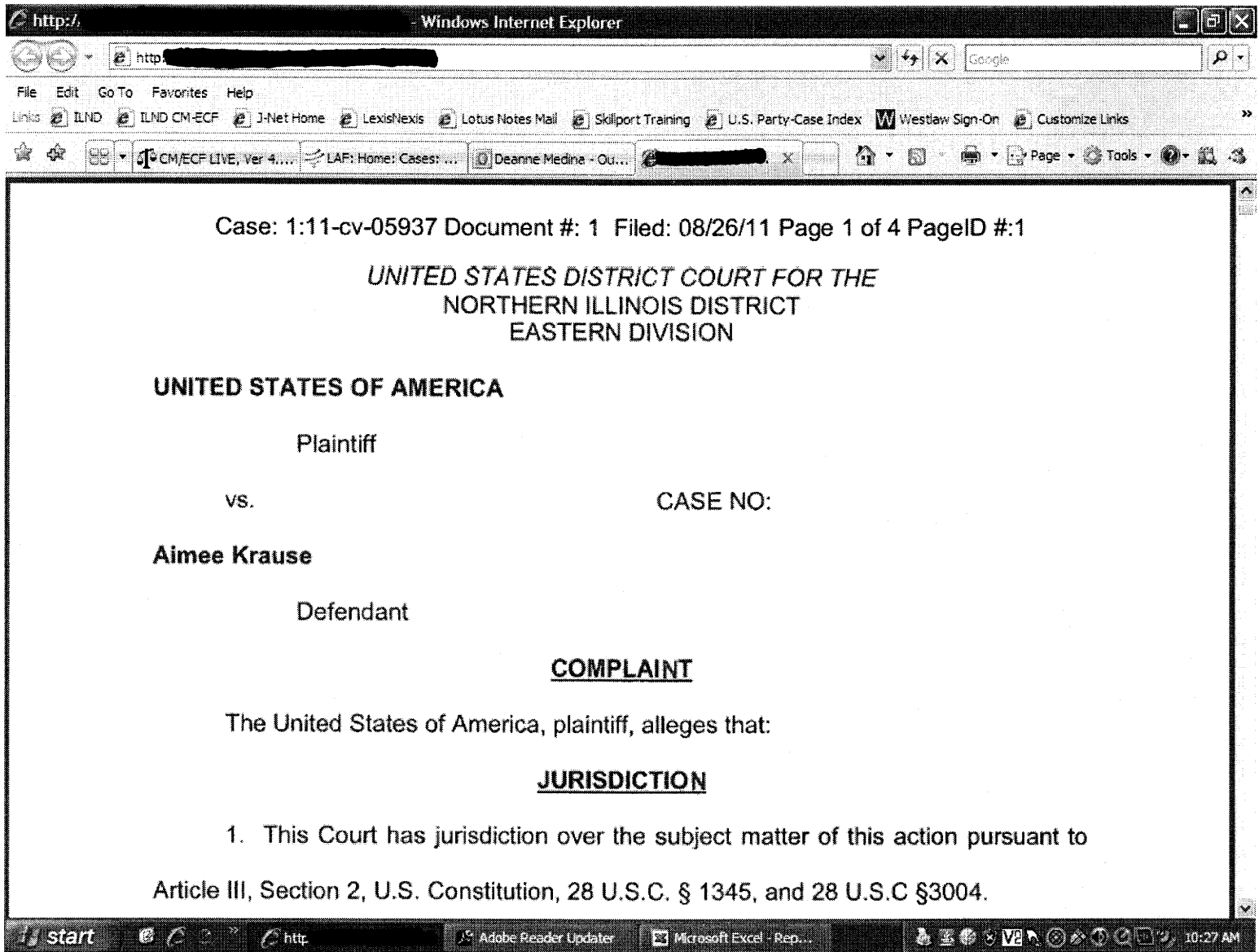


Exhibit
A